



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

February 19, 2025

**BY ECF**

Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 15C  
New York, NY 10007

Re: *Chan v. U.S.D.O.T.*, 23-cv-10365 (LJL)  
*New Yorkers Against Congestion Pricing Tax v. U.S.D.O.T.*, 24-cv-367 (LJL)  
*Mulgrew v. U.S.D.O.T.*, 24-cv-1644 (LJL)

Dear Judge Liman:

I write respectfully pursuant to Local Rule 1.4 to request the Court's leave to withdraw as counsel for the Federal Defendants in the above-referenced matters. The reason for this request is that I have developed a conflict pursuant to New York Rules of Professional Responsibility 1.7 and 1.11(d)(2) that prevents my continued participation in these matters. The Federal Defendants will continue to be represented by other counsel from the U.S. Attorney's Office for the Southern District of New York who have appeared. My withdrawal as an attorney of record will not affect any deadlines or cause any delay. Accordingly, I respectfully request that the Court grant my request to withdraw as counsel of record. I thank the Court for its consideration of this request.

Respectfully,

MATTHEW PODOLSKY  
Acting United States Attorney

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